

### **REMARKS**

Claims 2-7 remain pending in the application, claim 1 being canceled herein. No new matter is presented. The Applicants respectfully request entry of this Amendment.

#### **Claim 6 Rejection under § 112, second paragraph**

Claim 6 was rejected under 35 U.S.C. § 112, second paragraph, as being dependent upon claim 1, which was cancelled. Claim 6 has been amended to being dependent upon claim 2. It is therefore respectfully requested that the objection now be withdrawn.

#### **Claims 2-7 under §112, first paragraph**

Claims 2-7 were rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the enablement requirement. The Applicants have carefully reviewed the rejections and have amended the claims to comply with the enablement requirement. It is therefore respectfully requested that the objection now be withdrawn.

#### **Claims 4 and 5 Objection**

Claims 4 and 5 were objected to as being dependent upon a rejected base claim. The Applicants thank the Examiner for the indicating that claims 4 and 5 would be allowable if rewritten in independent form.

Claims 4 and 5 are amended herein to be in independent form. It is therefore respectfully requested that the objections now be withdrawn.

#### **Claims 2-7 over Huang**

In the Office Action, claims 2-7 were rejected under 35 USC § 102 as allegedly being anticipated by WO 97/23078 to Huang ("Huang"). The Applicants respectfully traverse the rejection.

Claim 2 recites a single coder/decoder to **selectively input one of a plurality of analog signals** and to selectively output an encoded signal to a

plurality of processors. Claims 3-7 recite a single coder/decoder to selectively input one of a plurality of digital signals and to selectively input one of a plurality of analog signal inputs and a first plurality of processors multiplexed to the single coder/decoder. Thus, claims 2-7 recite a system and method that relies on a single coder/decoder to selectively input one of a plurality of analog signals.

The Examiner alleges that Huang's coder/decoder 13 equates to the claimed single analog subsystem (See Office Action, page 4). The Examiner alleges that Huang discloses a single coder/decoder to selectively input one of a plurality of analog signals at col. 8, lines 5-10 and figure 3a. *Id.* The Examiner interprets the two analog coder/decoders in Fig. 3a as only a single coder/decoder because Fig. 3a was designed "with two digital trunks – however, each one of these digital trunks provides a plurality of digital signals." Office Action, p. 4 (emphasis in original).

Huang lacks any columns. The Applicants assume the Examiner intended to site page 8, lines 5-10 and fig. 3a. Huang at page 8, lines 5-10 discloses "An analog subsystem 13, comprises analog trunks 14 and A/D and D/A converter pairs 15, is needed only if analog trunks are to be supported by the GC, and therefore may be considered optional." Huang, at the Examiner's own cited passage, discloses a pair of coder/decoders that each input a single analog signal. Thus, nothing within the Examiner cited passage within Huang, nor anywhere else within Huang, discloses a single coder/decoder to selectively input one of a plurality of analog signals, as recited by claims 2-7.

Further, if we take either one of the coder/decoders by itself, as the Examiner interprets Fig. 3a, neither of Huang's coder/decoders 15 taken individually selectively input one of a plurality of analog signals. As Applicants previously pointed out, an important claimed feature is a single coder/decoder to process a plurality of analog signal that overcomes the deficiency within the art of having to use a plurality of coders/decoders to process a plurality of analog signal, such as disclosed by Huang. Hence, the rejection should be withdrawn because it fails to demonstrate that the applied reference discloses

each and every element of the claim. See MPEP 2131. "The identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). "Anticipation cannot be predicated on teachings in the reference which are vague or based on conjecture." *Studiengesellschaft Kohle mbH v. Dart Industries, Inc.*, 549 F. Supp. 716, 216 USPQ 381 (D. Del. 1982), *aff'd.*, 726 F.2d 724, 220 USPQ 841 (Fed. Cir. 1984).

For these and other reasons, claims 2-7 are patentable over the prior art of record. It is therefore respectfully requested that the rejections be withdrawn.

### **Conclusion**

All objections and rejections having been addressed, it is respectfully submitted that the subject application is in condition for allowance and a Notice to that effect is earnestly solicited.

Respectfully submitted,



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